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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**DECLARATION OF DAVID J. SHEEHAN IN FURTHER  
SUPPORT OF TRUSTEE'S MOTION *IN LIMINE* NUMBER 3**

I, DAVID J. SHEEHAN, declare the following:

1. I am a Partner with the law firm Baker & Hostetler LLP, counsel for Irving H. Picard, as trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the estate of Bernard L. Madoff ("Madoff").

2. I submit this declaration in further support of Trustee's Motion *in Limine* Number 3 to Exclude Deposition Testimony of Aaron Blecker.

3. True and correct copies of the following documents are attached:

Exhibit 1: Barbara Hoffman, *The Met's Biggest Fan is this 105-year-old Long Island Opera Lover*, New York Post (Sept. 22, 2016), <http://nypost.com/2016/09/22/the-mets-biggest-fan-is-this-105-year-old-long-island-opera-lover/>.

Exhibit 2: Letter from Seanna R. Brown to Helen Davis Chaitman regarding proposed stipulation on certain issues to alleviate burden on Mr. Blecker to testify, dated November 4, 2016.

I declare under penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746 (2).

Dated: New York, New York  
December 9, 2016

By: /s/ David J. Sheehan  
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